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SAVION, LLC RESPONSE

	)
	) **Public Utility Commission**
	) **of Texas**
Savion, LLC	) **Project No. 51840**
	) **Rulemaking to Establish**
	) **Electric Weatherization Standards**
	)

PROJECT NO. 51840

I. EXECUTIVE SUMMARY

1. Cited studies do not address solar or battery storage generation measures.
2. Commission has failed to promulgate required measures for solar or battery storage.
3. Lack of identified measures coupled with arbitrary deadlines increases risk to new development.
4. Proposed language to clarify attestation officials.

II. INTRODUCTION

Savion, a Green Investment Group portfolio company operating on a stand-alone basis, is one of the largest, most technologically advanced utility-scale solar and energy storage project development companies in the United States. With a growing portfolio of more than 11 GW, Savion's diverse team provides comprehensive services at each phase of renewable energy project development, from conception through construction. As part of this full-service model, Savion manages all aspects of development for customers, partners, and project host communities. Savion is committed to helping decarbonize the energy grid by replacing electric

power generation with renewable sources and delivering cost-competitive electricity to the marketplace.

III. BACKGROUND

The Public Utility Commission of Texas (commission) proposes new 16 Texas Administrative Code (TAC) §25.55, relating to weather emergency preparedness, to implement weather emergency preparedness measures for generation entities and transmission service providers in the Electric Reliability Council of Texas (ERCOT) power region, as required by Senate Bill 3 (SB 3), 87th Legislature Session (Regular Session).

Proposed §25.55 represents the first of two phases in the commission's development of robust weather emergency preparedness reliability standards. It is the intent of the commission that the primary objective of implementing phase one weather emergency preparedness reliability standards is to ensure that the electric industry is prepared to provide continuous reliable electric service throughout this upcoming winter season and to comply with the statutory deadline for the adoption of weather emergency preparedness reliability standards set forth in SB 3. Specifically, the proposal requires generators to implement the winter weather readiness actions identified in the 2012 Quanta Technology Report on Extreme Weather Preparedness Best Practices and to fix any known, acute issues that arose during the 2020 - 2021 winter weather season. Similarly, the commission requires transmission service providers to implement key recommendations contained in the 2011 Report on Outages and Curtailments During the Southwest Cold Weather Event on February 1-5, 2011, jointly prepared by the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation. Further, the proposal requires a notarized attestation from the highest ranking representative, official, or

official with binding authority over each of the above entities attesting to the completion of all required activities.

The commission will develop phase two of the weather emergency preparedness reliability standards in a future project. The phase two weather emergency preparedness reliability standards will consist of a more comprehensive, year-round set of weather emergency preparedness reliability standards that will be informed by a robust weather study that is currently being conducted by ERCOT in consultation with the Office of the Texas State Climatologist.

Interested persons may file comments electronically through the interchange on the commission' s website. Comments must be filed by September 16, 2021. No reply comments are requested. Comments should be organized in a manner consistent with the organization of the proposed rule. The commission invites specific comments regarding the costs associated with, and benefits that will be gained by, implementation of the proposed rule. The commission will consider the costs and benefits in deciding whether to modify the proposed rule on adoption. Commission staff strongly encourages commenters to include a bulleted executive summary to assist commission staff in reviewing the filed comments in a timely fashion. All comments should refer to Project Number 51840.

IV. SAVION RESPONSE

All responses are organized using the Project No. 51840 Proposal for Publication. [1]

[1] https://interchange.puc.texas.gov/Documents/51840_68_1150025.PDF

- Within the opening section of the Proposal of Publication, PUCT makes references two documents, the 2012 Quanta Technology Report on Extreme Weather Preparedness Best Practices[2] and the 2011 Report on Outages and Curtailments During the Southwest Cold Weather Event on February 1-5, 2011, jointly prepared by the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation.[3] Of concern to Savion is that neither report addresses the operation of solar energy resources or battery energy storage. Any development of solar or battery extreme weather requirements will have to be accomplished without the assistance of a more comprehensive study.
- (c) (1) (A) Since the two reports cited describing weatherization measures fails to address solar generation or battery storage. The Commission has failed to promulgate measures these generation assets need to meet.
- (c) (2) Solar generators will need to have weather mitigation measures enumerated prior to December 1, 2021. Due to the lack of promulgated measures for solar and energy storage, solar developers are exposed to risk of $1,000,000.00 per day for non-compliance with these non-existent requirements.
- (c) (2) (B) Recommend that the phrase "the generation entity' s highest-ranking representative, official, or officer with binding authority over the generation entity" be replaced with "an officer with binding authority over the generation entity".
- (c) (6) (A) (v) Recommend that the phrase "the generation entity' s highest-ranking representative, official, or officer with binding authority over the generation entity" be replaced with "an officer with binding authority over the generation entity".

V. CONCLUSION

[2] https://lrl.texas.gov/scanned/SIRSI/PUC_report_39646.pdf
[3] https://www.ferc.gov/sites/default/files/2020-04/08-16-11-report.pdf

The cited report produced by FERC and NERC on the 2011 outages does not address the extreme weather mitigation required for solar generation. However, solar panels are included in the study as active mitigation measures for methanol pumps in cold climates.[4]

Due to the lack of mechanical points of failure, solar generation and battery storage are by their nature cold hardened. Savion holds that extreme weather mitigation for solar generation and battery storage is not necessary to improve reliability.

Respectfully submitted,

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[4] FERC, et al. "Outages and Curtailments During the Southwest Cold Weather Event of February 1-5,2011" Appendix: GTI Report, pp 352. https://www.ferc.gov/sites/default/files/2020-04/08-16-11-report.pdf